UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)))
vs.) Case No.: 4:17-cr-578-CDP (SPM)
WILLIAM GUM,)
Defendant.)

FRIST MOTION TO CONTINUE TRIAL

Defendant, William Gum, by and through counsel, moves this Court to continue the trial set for September 17, 2018 for 30 days. In support of this motion, Defendant states as follows.

- 1. Defendant's trial is set for September 17, 2018.
- 2. The parties expect to enter into a plea agreement that will obviate the need for trial.
- 3. The parties have not yet reduced the terms of the agreement to writing, though.
- 4. As a result, counsel for Defendant needs additional time to finalize this agreement and review its terms with Defendant.

WHEREFORE, Defendant respectfully requests this Court continue the trial set for September 17, 2018 for 30 days.

Respectfully submitted,

ROSENBLUM, SCHWARTZ & FRY, P.C.,

By: <u>/s/ Adam D. Fein</u>

ADAM D. FEIN, #52255 MO Attorney for Defendant 120 S. Central Avenue, Suite 130 Clayton, Missouri 63105 (314) 862-4332/Facsimile (314) 862-8050

Email: afein@rsflawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2018, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Jeannette Graviss and Mr. Kyle T. Bateman, Assistant United States Attorneys.